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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VICTOR PEREZ, as Special Administrator of the Estate of CARLOS PEREZ, deceased; VICTOR PEREZ, as the Guardia Ad Litem for S.E.P., a minor; VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor,

Plaintiffs,
vs.

STATE OF NEVADA, ex.rel. NEVADA DEPARTMENT OF CORRECTIONS; DIRECTOR GREG COX, individually; WARDEN DWIGHT NEVEN, individually; ASSISTANT WARDEN TIMOTHY FILSON, individually; COT. RAMOS, individually; LIEUTENANT OLIVER, individually; CORRECTIONS OFFICER CASTRO, individually; CORRECTIONS OFFICER SMITH, individually; and DOES I-X, inclusive; and ROES I-X, inclusive,

Defendants.

CASE NO.: 2:15-cv-01572-APG-DJA

**STIPULATION AND ORDER TO
EXTEND MOTION FOR
SUMMARY JUDGMENT BRIEFING
DEADLINES
(Second Request)**

Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill, Defendant Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., of the law firm of Lewis Brisbois Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada Department of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver, by and through their counsel, Akke Levin, Esq., of the Attorney General's Office, Defendant Isaiah Smith, by and through his counsel of record Jeffrey F. Barr, Esq. of the law firm of Armstrong Teasdale, and Defendant Jeff Castro, by and through his counsel, James A. Beckstrom, Esq., of the law firm of Marquis Aurbach Coffing, hereby respectfully submit this Stipulation and Order Extending Time

1 for: (1) Plaintiff to Respond to Defendant Corrections Officer Castro's Motion for Summary
 2 Judgment [Dkt 146], Defendant Raynaldo-John Ramos' Motion for Summary Judgment [Dkt
 3 147], State of Nevada Ex Rel. Nevada Department of Corrections, James "Greg" Cox, Timothy
 4 Filson, Dwight Neven and Ronald Oliver's Motion for Summary Judgment [Dkt 153], and
 5 Defendant Isaiah Smith's Motion for Summary Judgment [Dkt 159] all filed on October 25, 2021,
 6 which responses are currently due on December 22, 2021, to be extended up to and including
 7 January 5, 2022; and (2) all Defendants to file their Replies, currently due on January 21, 2021, to
 8 be extended to and including February 4, 2022.

9 The law firm of Plaintiff's counsel has experienced some unexpected personnel changes.
 10 Those personnel changes directly affect the work being done on the Plaintiff's case. As such,
 11 Plaintiff's counsel requested a two week extension to file the four Responses to the Defendants'
 12 Motions for Summary Judgment. Counsel for the Defendants have no objection to extending the
 13 deadline for Responses and the parties further stipulate to extend the date to reply to Plaintiffs'
 14 Responses. This request for extension is made in good faith and not for the purposes of delay.

15 WHEREFORE, the parties stipulate that the time for Plaintiffs to file their Response(s) to
 16 Defendant Corrections Officer Castro's Motion for Summary Judgment [Dkt 146], Defendant
 17 Raynaldo-John Ramos' Motion for Summary Judgment [Dkt 147], State of Nevada Ex Rel.
 18 Nevada Department of Corrections, James "Greg" Cox, Timothy Filson, Dwight Neven and
 19 Ronald Oliver's Motion for Summary Judgment [Dkt 153], and Defendant Isaiah Smith's Motion
 20 for Summary Judgment [Dkt 159], be extended for two weeks up to and including January 5,
 21 2022 and the time for Defendants to file their Replies be extended to and including February 4.
 22 2022. Respectfully submitted this 13th day of December 2021.

23 **CLARK HILL, PLLC**

24 /s/ *Paola M. Armeni, Esq.*

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26 *Dwight W. Neven, James Greg Cox*
27 *Ronald Oliver, Timothy Filson*

28 **ORDER**

1 **IT IS SO ORDERED:**

2 DATED: December 14, 2021

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4 UNITED STATES DISTRICT COURT JUDGE
5 CASE NO.: 2:15-cv-01572-APG-DJA